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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

02 JUL 30 AM 9:32

IN THE MATTER OF

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CASE NO: 02-06882(GAO)

MINERVA ALVIRA TORRES
JUAN MARTES ORTIZ

CHAPTER 13

**MOTION OBJECTING CONFIRMATION OF PLAN
AND REQUESTING DISMISSAL**

Comes now, secured creditor, Empresas Berrios, Inc., D/B/A Mueblerias Berrios, through the undersigned attorney and very respectfully to this Honorable Court alleges and prays:

1. Movant is a holder of a secured claim against above mentioned debtor by means of a duly registered conditional sales contract, in the amount of **\$1,231.82**(Account Number 17-010368-01, Sales Date 10-03-097).

2. Debtor's Chapter 13 Plan is schedule for confirmation on 11-07-02.

3. Said Plan submitted by debtor does not include Mueblerias Berrios as a secured creditor not provides adequate protection to the interests of Mueblerias Berrios under Section 361 of the Bankruptcy Code.

4. In order to have the plan confirmed by this Honorable Court, Debtor must amend her plan to provide for Mueblerias Berrios' secured claim.

WHEREFORE, it is respectfully requested that this Honorable Court deny the confirmation of the plan proposed by above captioned debtor and in accordance with the provisions of Section 1307(c)(5) dismiss this case.

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NOTICE TO ALL PARTIES is herein given to the effect that if no opposition is filed within thirty (30) days from this notice the Court may enter an Order dismissing the case without further hearing.

CERTIFICATE OF SERVICE: I hereby certify that on this same day a true and exact copy of the present motion was sent by regular mail to: Lcdo. Jose R Carrión Morales, Chapter 13 Trustee, and to debtor's attorney: Lcdo. Angel M. Egozcue, to their address of record.



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